

ORIGINAL

2-10-01

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

BARBARA A. WILHELM,
Plaintiff

v.

COMMONWEALTH OF PA.;
PENNSYLVANIA STATE POLICE;
COLONEL PAUL J. EVANKO,
COMMISSIONER; LIEUTENANT
COLONEL THOMAS K. COURY; and
CAPTAIN MICHAEL. D. SIMMERS,
Defendants

NO. 1:CV-01-1057

(JUDGE RAMBO)

FILED
HARRISBURG, PA

JUL - 1 2003

MARY E. D'ANDREA, CLERK
Per

**MOTION FOR LEAVE TO EXCEED 15 PAGE LIMIT ON REPLY
MEMORANDUM IN SUPPORT OF PLAINTIFF'S PETITION FOR
ATTORNEYS' FEES AND COSTS**

Plaintiff hereby moves the Court to permit plaintiff to exceed the 15 page limit imposed by Local Rule 7.8 on plaintiff's reply memorandum in support of plaintiff's petition for attorneys' fees and costs. Plaintiff requests that she be permitted to file a memorandum not to exceed 30 pages. In support of this motions plaintiff states as follows:

1. Plaintiff filed a petition for attorneys' fees and costs on May 6, 2003.
2. On June 9, 2003, defendants filed a memorandum in opposition to plaintiff's petition for attorneys' fees and costs.

3. This Court granted defendants' request to permit defendants' memorandum in opposition to plaintiff's petition for attorneys' fees to exceed the 15 page limit imposed by Local Rule 7.8.
4. The volume to challenges contained in defendants' memorandum are so numerous that 15 pages are not adequate to respond.
5. Plaintiff's reply memorandum in support of attorneys' fees and costs is due June 27, 2003.
6. By this motion, the plaintiff requests leave of the court to submit a reply memorandum in support of plaintiff's petition for attorneys' fees and costs not to exceed 30 pages.
7. The additional pages will serve the interests of judicial economy by allowing the plaintiff to present her arguments fully and clearly.
8. Plaintiff's counsel was unsuccessful in his attempt to contact counsel for the defendants, Susan J. Forney, Esquire, to determine if she objected to this motion.

WHEREFORE, plaintiff respectfully requests that this Court grant her leave to file the reply memorandum in support of plaintiff's petition for attorneys' fees and costs not to exceed 30 pages.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Nathan C. Pringle, Jr.", written over a horizontal line.


Nathan C. Pringle, Jr.
Attorney I. D. Number 30142
3601 North Progress Avenue
Suite 200
Harrisburg, PA 17110
(717) 909-8520
Attorney for Plaintiff

June 27, 2003

CERTIFICATE OF SERVICE

I, Nathan C. Pringle, Jr., hereby certify that on June 27, 2003, I caused to be served by first-class mail a copy of the foregoing document entitled Motion for Leave to Exceed 15 Page Limit on Reply Memorandum in Support of Plaintiff's Petition for Attorneys' Fees and Costs upon the following:

Susan J. Forney
Chief Deputy Attorney General
Office of Attorney General
Litigation Section
15th Floor, Strawberry Square
Harrisburg, PA 17120


Nathan C. Pringle, Jr.